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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR
MDL No. 3047

This Document Relates to:

16 | *Ridener v. Meta Platforms Inc. et al*, 4:24-cv-03059;

Jones v. ByteDance, Ltd. et al, 4:24-cv-03287;

19 *Jacobs v. YouTube, LLC et al*, 4:24-cv-
04646;

Hill v. Meta Platforms, Inc. et al, 4:24-cv-08451;

22 *J.P., et al., v. ByteDance, Ltd, et al., 4:24-cv-09075;*

24 | P a g e
C.H., et al., v. Meta Platforms, Inc., et al.,
4:24-cv-09077;

25 *HS, et al., v. Meta Platforms, Inc., et al.,*
4:24-cv-09401;

27 *CG, et al., v. Meta Platforms, Inc., et al.,*
4:24-cv-09407;

28 A.G., et al. v Meta Platforms, Inc., et al.,

**DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THE DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT OF
PLAINTIFFS' FOURTEENTH
CONSOLIDATED *EX PARTE*
APPLICATION FOR APPOINTMENT OF
GUARDIANS *AD LITEM***

1 4:24-cv-09343;
 2 *S.S., et al., v. ByteDance, Ltd, et al., 4:24-cv-*
 3 *09398;*
 4 *K.B., et al., v. Meta Platforms, Inc., et al.,*
 5 *4:25-cv-00121;*
 6 *J.K., et al., v. Meta Platforms, Inc., et al.,*
 7 *4:25-cv-00166;*
 8 *J.S., et al. v. ByteDance, Ltd., et al., 4:25-cv-*
 9 *00275;*
 10 *S.C., filed on behalf of minor W.C. v. Meta*
 Platforms and Instagram, LLC, 4:25-cv-
 11 *2398;*
 12 *A.M., filed on behalf of minor M.M. v. Meta*
 Platforms, Inc., et al., 4:25-cv-2756;
 13 *P.H., filed on behalf of minor A.B. v.*
 ByteDance, Ltd. et al, 4:25-cv-2786;
 14 *M.S. filed on behalf of minor A.S. v. Meta*
 Platforms, Inc. et al., 4:25-cv-3175;
 15 *A.B., filed on behalf of minor A.B. v. Meta*
 Platforms, Inc. et al, 4:25-cv-3705;
 16 *D.W. v. ByteDance, Inc. et al, 4:25-cv-3713;*
 17 *D.W. v. Meta Platforms, Inc. et al, 4:25-cv-*
 3796;
 18 *J.A. filed on behalf of minor A.A. v. Meta*
 Platforms, Inc. and Instagram, LLC, 4:25-
 cv-4007.

19 I, Jennie Lee Anderson, do hereby declare and state as follows:
 20
 21 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
 22 to practice before the courts of the State of California and in the Northern District of California. I
 23 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*
 24 *Addiction/Personal Injury Products Litigation*, Case No. 4:22-MD-03047, and a counsel of
 25 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
 26 make this declaration of my own personal knowledge and, if called as a witness, I could and
 27 would testify competently to the matters stated below.
 28

1 2. I make this declaration in support of Plaintiffs' Administrative Motion to File
 2 Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs'
 3 Fourteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 4 ("Administrative Motion to Seal").

5 3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on
 6 February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs
 7 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of
 8 Plaintiffs' Fourteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 9 ("Anderson Declaration").

10 4. True and correct copies of the following Exhibits to the Anderson Declaration
 11 are as follows and attached hereto:

- 12 • *Ridener v. Meta Platforms Inc. et al*, 4:24-cv-03059 (Exhibit 1);
- 13 • *Jones v. ByteDance, Ltd. et al*, 4:24-cv-03287 (Exhibit 3);
- 14 • *Jacobs v. YouTube, LLC et al*, 4:24-cv-04646 (Exhibit 4);
- 15 • *Hill v. Meta Platforms, Inc. et al*, 4:24-cv-08451 (Exhibit 5);
- 16 • *J.P., et al., v. ByteDance, Ltd, et al.*, 4:24-cv-09075 (Exhibit 6);
- 17 • *C.H., et al., v. Meta Platforms, Inc., et al.*, 4:24-cv-09077 (Exhibit 7);
- 18 • *HS, et al., v. Meta Platforms, Inc., et al.*, 4:24-cv-09401 (Exhibit 8);
- 19 • *CG, et al., v. Meta Platforms, Inc., et al.*, 4:24-cv-09407 (Exhibit 9);
- 20 • *A.G., et al. v Meta Platforms, Inc., et al.*, 4:24-cv-09343 (Exhibit 10);
- 21 • *S.S., et al., v. ByteDance, Ltd, et al.*, 4:24-cv-09398 (Exhibit 11);
- 22 • *K.B., et al., v. Meta Platforms, Inc., et al.*, 4:25-cv-00121 (Exhibit 12);
- 23 • *J.K., et al., v. Meta Platforms, Inc., et al.*, 4:25-cv-00166 (Exhibit 13);
- 24 • *J.S., et al. v. ByteDance, Ltd., et al.*, 4:25-cv-00275 (Exhibit 14);
- 25 • *S.C., filed on behalf of minor W.C. v. Meta Platforms and Instagram, LLC*, 4:25-cv-2398
 26 (Exhibit 15);
- 27 • *A.M., filed on behalf of minor M.M. v. Meta Platforms, Inc., et al.*, 4:25-cv-2756 (Exhibit
 28 17);
- 29 • *P.H., filed on behalf of minor A.B. v. ByteDance, Ltd. et al*, 4:25-cv-2786 (Exhibit 18);

- 1 • *M.S. filed on behalf of minor A.S. v. Meta Platforms, Inc. et al., 4:25-cv-3175 (Exhibit*
2 *19);*
- 3 • *A.B., filed on behalf of minor A.B. v. Meta Platforms, Inc. et al, 4:25-cv-3705 (Exhibit*
4 *20);*
- 5 • *D.W. v. ByteDance, Inc. et al, 4:25-cv-3713 (Exhibit 21);*
- 6 • *D.W. v. Meta Platforms, Inc. et al, 4:25-cv-3796 (Exhibit 22);*
- 7 • *J.A. filed on behalf of minor A.A. v. Meta Platforms, Inc. and Instagram, LLC, 4:25-cv-*
8 *4007 (Exhibit 23).*

9 5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to a
10 standing stipulation that the individual applications seeking appointment of guardians *ad litem* in
11 this litigation may be filed under seal. Defendants also confirmed that, in so stipulating,
12 Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future
13 to unseal individual applications and/or require parents who wish to proceed pseudonymously
14 going forward make a showing of good cause.

15 I declare under penalty of perjury pursuant to the laws of the United States of America that
16 the foregoing is true and correct.

17 Dated: June 24, 2025

18 Respectfully submitted,

19 /s/Jennie Lee Anderson
20 Jennie Lee Anderson

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